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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
Luis Javier Vazquez, and Kyle Kingsbury on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship
and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF WILLIAM
ISAACSON IN SUPPORT OF THE
PARTIES' JOINT AGREED
MOTION FOR LEAVE TO FILE
SUMMARY JUDGMENT BRIEFING
MATERIALS IN EXCESS OF PAGE
LIMITS IMPOSED BY LOCAL
RULE 7-3**

1 I, William Isaacson, declare as follows:

- 2 1. I am a member in good standing of the bar of the District of Columbia. I am admitted *pro hac*
3 *vice* to practice before this Court. I am a Partner in the law firm law firm Paul, Weiss,
4 Rifkind, Wharton & Garrison LLP (“PW”), counsel for Zuffa, LLC (“Zuffa”) in the above
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*,
6 No. 2:15-cv-01045-RFP-PAL.
- 7 2. I make this declaration in support of the Parties’ Joint Agreed Motion for Leave to File
8 Summary Judgment Briefing Materials in Excess of Page Limits Imposed By Local Rule 7-3.
- 9 3. Based on my review of the files, records, and communications in this case, I have personal
10 knowledge of the facts set forth in this Declaration and, if called to testify, could and would
11 testify competently to those facts under oath.
- 12 4. Counsel for Zuffa met and conferred with counsel for Plaintiffs regarding modifying the page
13 limits related to Zuffa’s Renewed Motion for Summary Judgment briefing. The parties
14 reached an agreement regarding modification of the page limits as specified in District of
15 Nevada Local Rule 7-3(a).
- 16 5. The parties jointly move the Court to permit the parties to allocate 40 pages for Zuffa’s
17 Renewed Motion for Summary Judgment, 40 pages for Plaintiffs’ Opposition to Zuffa’s
18 Renewed Motion for Summary Judgment, and 21 pages for Zuffa’s Reply in Support of its
19 Renewed Motion for Summary Judgment.
- 20 6. This case was filed in December 2014. The Consolidated Amended Complaint includes
21 theories of liability based on both monopolization and monopsonization.
- 22 7. Plaintiffs are seeking over one billion dollars in damages before trebling.
- 23 8. Since the case was filed, the parties have engaged in extensive fact and expert discovery,
24 including several million documents, more than 50 depositions, and more than 800 pages of
25 expert reports.
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- 1 9. Zuffa has produced over 3.2 million pages of documents plus native files. Plaintiffs have
2 produced approximately 64,000 pages of documents. The parties subpoenaed documents
3 from numerous third parties, totaling over 318,000 pages of documents.
- 4 10. The parties took more than 50 depositions.
- 5 11. In total, the parties have exchanged 855 pages of opening, opposition, and rebuttal expert
6 reports. Excluding exhibits, resumes, errata and appendices, Plaintiffs' opening expert reports
7 for its three expert reports totaled 316 pages. Excluding exhibits, resumes, errata and
8 appendices, Zuffa's opposition expert reports for its five expert reports totaled 255 pages.
9 Excluding exhibits, resumes, errata and appendices, Plaintiffs' rebuttal expert reports for its
10 four expert reports totaled 284 pages.
- 11 12. Due to the extensive nature of discovery in this case and the complexity of the record, the
12 parties seek leave from the Court to extend the page limits in order to ensure that all material
13 issues can be adequately addressed.
- 14 13. I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing facts are true and correct. Executed this 21 day of October 2023, in Washington
16 D.C.

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18 /s/ William Isaacson
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